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this case moves forward. ECF No. 69. The parties further explained that until that person was identified and appointed, counsel for Mr. Williams lacked a client who could agree to terms at a meet and confer. Id. As such, the parties requested a 90 day extension of discovery. Id. The parties also stipulated that the March 8, 2024 deadline for them to meet and confer as to the issues raised during the February 26, 2024 preliminary injunction hearing be extended to April 8, 2024, and that the court continue the March 28, 2024 status conference to a date after April 8, 2024. *Id.* On March 7, 2024, the Court granted the parties' stipulation. ECF No. 70.

On April 8, 2024, the parties filed a Stipulation to Extend April 8, 2024 Deadline to Meet and Confer and Attend Status Hearing (First Request). ECF No. 74. In that Stipulation, counsel for Jam On It Defendants represented to the Court that an administrator has not yet been appointed for Mr. Williams' estate, and the Jam On It Defendants did not have a contact person for Mr. Williams' estate. Id. Counsel further represented that because Mr. Williams' estate did not have a representative, counsel for Jam On It Defendants did not have direction to represent two of the entities for which Mr. Williams was the point of contact: Jam On It, LLC and Jam On It Sportsplex, LLC (a dissolved entity). *Id.* Counsel for Jam On It Defendants further represented that Mr. Clint Welch is now the President of Defendant Jam On It Basketball Academy, Inc. (in place of Mr. Williams). Id. Based on these facts, the parties respectfully requested that the April 8, 2024 deadline for them to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until June 10, 2024, and continue the April 11, 2024 status conference to a date after June 10, 2024. Id.

On April 9, 2024, the Court granted the Stipulation and ordered that the April 8, 2024 deadline for the parties to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until June 10, 2024. ECF No. 75. The Court further ordered that the status conference scheduled for April 11, 2024, at 11:00 a.m. be vacated and be rescheduled to Friday, June 21, 2024, at 1:00 p.m. *Id*.

On May 7, 2024, Jam On It Basketball Academy, Inc. filed a Suggestion of Death on the Record (ECF No. 78). On May 24, 2024, the parties filed a Stipulation and Order to Amend

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Caption to add the Estate of Matthew Williams as a party (ECF No. 81), and also filed a Stipulation and Order to Extend Discovery (Third Request) to extend case management deadlines based partially on the fact that all parties to this action are attending a mediation on June 13, 2024. ECF No. 80. The Court granted both of these Stipulations on May 29, 2024. ECF Nos. 82 and 84.

On June 7, 2024, the parties filed a Stipulation to Extend August June 10, 2024 Deadline to Meet and Confer and Attend Status Hearing (First Request). ECF No. 85. In that Stipulation, the parties requested that the June 10, 2024 deadline for them to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until August 9, 2024, and continue the June 21, 2024 status conference to a date after August 9, 2024. *Id.* The basis for the stipulation was that the parties were attending a mediation on June 13, 2024, and that case management deadlines had been extended in ECF No. 84. Id.

On June 7, 2024, the Court granted the Stipulation and ordered that the June 10, 2024 deadline for the parties to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until August 9, 2024. ECF No. 86. In a Minute Order entered on June 11, 2024, the Court continued the status conference scheduled for Friday, June 21, 2024, at 1:00 p.m. to Friday, August 16, 2024, at 10.a.m. ECF No. 87.

On July 31, 2024, the parties filed a Stipulation to Extend August 9, 2024 Deadline to Meet and Confer and Attend Status Hearing (First Request). ECF No. 88. In that Stipulation, the parties requested that the August 9, 2024 deadline for them to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until October 8, 2024, and continue the August 16, 2024 status conference to a date after October 8, 2024. *Id.* The basis for the stipulation was that the parties were in process of preparing settlement documents for review and comment and wanted to focus their resources on attempting to resolve this action via a negotiated settlement. ECF No. 88. *Id.* 

On August 1, 2024, the Court granted the Stipulation (ECF No. 88) and ordered the August 9, 2024 deadline for the parties to meet and confer as to the issues raised during the October 18, 2024, at 11:00 a.m. ECF No. 89.

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In light of the foregoing, the parties respectfully request that the January 6, 2025 deadline for them to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 60 days, until Friday, March 7, 2025, and continue the January 16, 2025

status conference to a date after March 7, 2025.

On October 3, 2024, the parties filed a Stipulation to Extend October 8, 2024 Deadline to Meet and Confer and Attend Status Hearing (First Request). ECF No. 92. In that Stipulation, the parties requested that the October 9, 2024, deadline for them to meet and confer as to the issues raised during the February 26, 2024 hearing be extended for a period of 90 days, until January 6, 2025, and continue the October 18, 2024 status conference to a date after January 6, 2025. *Id.* The basis for the stipulation was that the parties were in process of preparing settlement documents for review and comment and wanted to focus their resources on attempting to resolve this action via a negotiated settlement. ECF No. 92. *Id*.

February 26, 2024 hearing be extended to Tuesday, October 8, 2024, and the current status

conference scheduled for August 16, 2024, at 10:00 a.m. be vacated and rescheduled to Friday,

On October 4, 2024, the Court granted the Stipulation (ECF No. 92) and ordered the October 9, 2024 deadline for the parties to meet and confer as to the issues raised during the February 26, 2024 hearing be extended to Tuesday, January 6, 2025, and the current status conference scheduled for October 18, 2024, at 10:00 a.m. be vacated and rescheduled to Thursday, January 16, 2025, at 2:00 p.m. ECF No. 93.

Without waiving any rights or remedies or disclosing any settlement terms, the parties disclose that they have exchanged multiple drafts of settlement documents. While the parties are getting closer to finalizing a settlement agreement, a few final terms need to be negotiated and finalized. The parties are working diligently to finalize the settlement agreement and would like to continue focusing their resources on attempting to resolve this action via a negotiated settlement.

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